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2 Acting United States Attorney
3 DAVID T. RYAN
4 Assistant United States Attorney
5 Chief, National Security Division
6 COLIN S. SCOTT (Cal. Bar No. 318555)
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15 E-mail: colin.scott@usdoj.gov

16 Attorneys for Plaintiff
17 UNITED STATES OF AMERICA

18 UNITED STATES DISTRICT COURT

19 FOR THE CENTRAL DISTRICT OF CALIFORNIA

20 UNITED STATES OF AMERICA,

21 No. 24-CR-00761

22 Plaintiff,

23 STIPULATION REGARDING REQUEST FOR
(1) CONTINUANCE OF TRIAL DATE AND
(2) FINDINGS OF EXCLUDABLE TIME
PERIODS PURSUANT TO SPEEDY TRIAL
ACT

24 v.

25 Zheng et al.,

26 Defendant.

27 **CURRENT TRIAL DATE:** March 18,
28 2025 (Defendants Wang, Liu, Lin,
Hoffman, Rosales, Gomez, and
Liufu,) March 25, 2025 (Andy
Estuardo Castillo Perez)
PROPOSED TRIAL DATE: December 8,
2025

29 Plaintiff United States of America, by and through its counsel
30 of record, the Acting United States Attorney for the Central District
31 of California and Assistant United States Attorneys Colin S. Scott
32 and Amanda B. Elbogen, and defendants Hexi Wang (#2), Jin Liu (#3),
33 Dong Lin (#4), Daniel Acosta Hoffman (#5), Jesse James Rosales (#6),
34 Andy Estuardo Castillo Perez (#7), Marck Anthony Gomez (#8), and

1 Galvin Biao Liufu (#9) ("defendants"), both individually and by and
2 through their counsel of record hereby stipulate as follows:

3 1. The Indictment in this case was made public on January 24,
4 2025. Defendants Hexi Wang (#2), Jin Liu (#3), Dong Lin (#4), Daniel
5 Acosta Hoffman (#5), Jesse James Rosales (#6), Marck Anthony Gomez
6 (#8), and Galvin Biao Liufu (#9) first appeared before a judicial
7 officer of the court in which the charges in this case were pending
8 on January 24, 2025. The Speedy Trial Act, 18 U.S.C. § 3161,
9 originally required that the trial commence on or before April 4,
10 2025.

11 2. Defendant Andy Estuardo Castillo Perez (#7) first appeared
12 before a judicial officer of the court in which the charges case were
13 pending on January 29, 2025. The Speedy Trial Act, 18 U.S.C. § 3161,
14 originally required that the trial commence on or before April 9,
15 2025.

16 3. Defendant Weijun Zheng is a fugitive.

17 4. On January 24, 2025, the Court set a trial date of March
18 18, 2025 for Hexi Wang (#2), Jin Liu (#3), Dong Lin (#4), Daniel
19 Acosta Hoffman (#5), Jesse James Rosales (#6), Marck Anthony Gomez
20 (#8), and Galvin Biao Liufu (#9).

21 5. On January 29, 2025, the Court set a trial date of March
22 25, 2025 for Andy Estuardo Castillo Perez (#7).

23 6. Defendants Hexi Wang (#2), Jin Liu (#3), Dong Lin (#4),
24 Daniel Acosta Hoffman (#5), Jesse James Rosales (#6), Andy Estuardo
25 Castillo Perez (#7), Marck Anthony Gomez (#8), and Galvin Biao Liufu
26 (#9) are released on bond. The parties estimate that the trial in
27 this matter will last approximately fourteen days. All defendants
28 are joined for trial and a severance has not been granted.

1 7. By this stipulation, defendants move to continue the trial
2 date to December 8, 2025. This is the first request for a
3 continuance.

4 8. Defendant requests the continuance based upon the following
5 facts, which the parties believe demonstrate good cause to support
6 the appropriate findings under the Speedy Trial Act:

7 a. Defendants Hexi Wang (#2), Daniel Acosta Hoffman (#5),
8 Jesse James Rosales (#6), Andy Estuardo Castillo Perez (#7), and
9 Marck Anthony Gomez (#8) are charged with a violation of 18 U.S.C. §
10 371: Conspiracy; 18 U.S.C. § 549: Breaking Custom Seals; and 18
11 U.S.C. § 545: Smuggling. Defendants Jin Liu (#3) and Dong Lin (#4)
12 are charged with a violation of 18 U.S.C. § 371: Conspiracy.

13 Discovery in this complex case is voluminous. The government is
14 negotiating the entry of a protective orders with defendants in this
15 case for the provision of discovery to defendants. This data
16 includes approximately over 4,000 files, which includes investigatory
17 reports, search warrants, and as well as audio and video files. The
18 government has made discovery available to all defense counsel for
19 inspection, and is currently working to transfer the voluminous
20 discovery to the defendants that have agreed to the Court's
21 protective order in this case.

22 b. Due to the nature of the prosecution and the number of
23 defendants including the charges in the indictment and the voluminous
24 discovery produced to defendants, this case is so unusual and so
25 complex that it is unreasonable to expect adequate preparation for
26 pretrial proceedings or for the trial itself within the Speedy Trial
27 Act time limits.

1 c. Defense counsel represent that they have various
2 substantive obligations between now and the current trial date, which
3 necessitate the continuance of the trial to December 8, 2025. The
4 list of obligations for defense counsel is attached hereto as
5 Appendix A and is incorporated as if fully set forth herein.

6 d. In light of the foregoing, counsel for defendants also
7 represent that additional time is necessary to confer with
8 defendants, conduct and complete an independent investigation of the
9 case, conduct and complete additional legal research including for
10 potential pre-trial motions, review the discovery and potential
11 evidence in the case, and prepare for trial in the event that a
12 pretrial resolution does not occur. Defense counsel represent that
13 failure to grant the continuance would deny them reasonable time
14 necessary for effective preparation, taking into account the exercise
15 of due diligence.

16 e. Defendants believe that failure to grant the
17 continuance will deny them continuity of counsel and adequate
18 representation.

19 f. The government does not object to the continuance.

20 g. The requested continuance is not based on congestion
21 of the Court's calendar, lack of diligent preparation on the part of
22 the attorney for the government or the defense, or failure on the
23 part of the attorney for the Government to obtain available
24 witnesses.

25 9. For purposes of computing the date under the Speedy Trial
26 Act by which Defendants Hexi Wang (#2), Jin Liu (#3), Dong Lin (#4),
27 Daniel Acosta Hoffman (#5), Jesse James Rosales (#6), Marck Anthony
28 Gomez (#8), and Galvin Biao Liufu (#9) trial must commence, the

1 parties agree that the time period of March 18, 2025 to December 8,
2 2025, inclusive, should be excluded pursuant to 18 U.S.C.
3 §§ 3161(h)(7)(A), (h)(7)(B)(i), (h)(7)(B)(ii) and (h)(7)(B)(iv)
4 because the delay results from a continuance granted by the Court at
5 defendant's request, without government objection, on the basis of
6 the Court's finding that: (i) the ends of justice served by the
7 continuance outweigh the best interest of the public and defendant in
8 a speedy trial; (ii) failure to grant the continuance would be likely
9 to make a continuation of the proceeding impossible, or result in a
10 miscarriage of justice; (iii) the case is so unusual and so complex,
11 due to the nature of the prosecution and the number of defendants,
12 that it is unreasonable to expect preparation for pre-trial
13 proceedings or for the trial itself within the time limits
14 established by the Speedy Trial Act; and (iv) failure to grant the
15 continuance would unreasonably deny defendant continuity of counsel
16 and would deny defense counsel the reasonable time necessary for
17 effective preparation, taking into account the exercise of due
18 diligence.

19 10. For purposes of computing the date under the Speedy Trial
20 Act by which Defendant Andy Estuardo Castillo Perez (#7) trial must
21 commence, the parties agree that the time period of March 25, 2025 to
22 December 8, 2025, inclusive, should be excluded pursuant to 18 U.S.C.
23 §§ 3161(h)(7)(A), (h)(7)(B)(i), (h)(7)(B)(ii) and (h)(7)(B)(iv)
24 because the delay results from a continuance granted by the Court at
25 defendant's request, without government objection, on the basis of
26 the Court's finding that: (i) the ends of justice served by the
27 continuance outweigh the best interest of the public and defendant in
28 a speedy trial; (ii) failure to grant the continuance would be likely

1 to make a continuation of the proceeding impossible, or result in a
2 miscarriage of justice; (iii) the case is so unusual and so complex,
3 due to the nature of the prosecution and the number of defendants,
4 that it is unreasonable to expect preparation for pre-trial
5 proceedings or for the trial itself within the time limits
6 established by the Speedy Trial Act; and (iv) failure to grant the
7 continuance would unreasonably deny defendant continuity of counsel
8 and would deny defense counsel the reasonable time necessary for
9 effective preparation, taking into account the exercise of due
10 diligence.

11 11. Nothing in this stipulation shall preclude a finding that
12 other provisions of the Speedy Trial Act dictate that additional time
13 periods be excluded from the period within which trial must commence.
14 Moreover, the same provisions and/or other provisions of the Speedy
15 Trial Act may in the future authorize the exclusion of additional
16 time periods from the period within which trial must commence.

17 IT IS SO STIPULATED.

18 | Dated: February 14, 2025

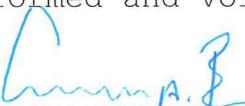
Respectfully submitted,

19 JOSEPH T. McNALLY
Acting United States Attorney

21 DAVID T. RYAN
Assistant United States Attorney
Chief, National Security Division

26 Attorneys for Plaintiff
UNITED STATES OF AMERICA

1 I am Hexi Wang's attorney. I have carefully discussed every
2 part of this stipulation and the continuance of the trial date with
3 my client. I have fully informed my client of his Speedy Trial
4 rights. To my knowledge, my client understands those rights and
5 agrees to waive them. I believe that my client's decision to give up
6 the right to be brought to trial earlier than March 18, 2025 is an
7 informed and voluntary one.

8 
9 ADAM H. BRAUN
10 Attorney for Defendant
Hexi Wang

Date

2/12/25

11
12 I have read this stipulation and have carefully discussed it
13 with my attorney. I understand my Speedy Trial rights. I voluntarily
14 agree to the continuance of the trial date, and give up my right to
15 be brought to trial earlier than March 18, 2025. I understand that I
16 will be ordered to appear in Courtroom 9A of the Federal Courthouse,
17 350 W. 1st Street, Los Angeles, California on December 8, 2025 at
18 8:30 a.m.

19 
20 Hexi Wang
Defendant

Date

2/12/25

1 I am Jin Liu's attorney. I have carefully discussed every part
2 of this stipulation and the continuance of the trial date with my
3 client. I have fully informed my client of his Speedy Trial rights.
4 To my knowledge, my client understands those rights and agrees to
5 waive them. I believe that my client's decision to give up the right
6 to be brought to trial earlier than March 18, 2025 is an informed and
7 voluntary one.

8 
9 ROBERT C. HSU
10 Attorney for Defendant
Jin Liu

2/13/2025
Date

11
12 I have read this stipulation and have carefully discussed it
13 with my attorney. This agreement has been read to me in Mandarin,
14 the language I understand best, and I have carefully discussed every
15 part of it with my attorney. I understand my Speedy Trial rights. I
16 voluntarily agree to the continuance of the trial date, and give up
17 my right to be brought to trial earlier than March 18, 2025. I
18 understand that I will be ordered to appear in Courtroom 9A of the
19 Federal Courthouse, 350 W. 1st Street, Los Angeles, California on
20 December 8, 2025 at 8:30 a.m.

21 
22 JIN LIU
Defendant

2-13-2025
Date

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CERTIFICATION OF INTERPRETER

I, Ronan Han am fluent in the written and spoken English and Mandarin languages. I accurately translated this entire agreement from English into Mandarin to defendant Liu on this date.

Frank

2 / 13 / 2025

1 I am Dong Lin's attorney. I have carefully discussed every part
2 of this stipulation and the continuance of the trial date with my
3 client. I have fully informed my client of his Speedy Trial rights.
4 To my knowledge, my client understands those rights and agrees to
5 waive them. I believe that my client's decision to give up the right
6 to be brought to trial earlier than March 18, 2025 is an informed and
7 voluntary one.

8 R. Darren Cornforth

2-12-25

9 Date

10 ROBERT DARREN CORNFORTH
Attorney for Defendant
DONG LIN

11

12 I have read this stipulation and have carefully discussed it
13 with my attorney. This agreement has been read to me in Mandarin,
14 the language I understand best, and I have carefully discussed every
15 part of it with my attorney. I understand my Speedy Trial rights. I
16 voluntarily agree to the continuance of the trial date, and give up
17 my right to be brought to trial earlier than March 18, 2025. I
18 understand that I will be ordered to appear in Courtroom 9A of the
19 Federal Courthouse, 350 W. 1st Street, Los Angeles, California on
20 December 8, 2025 at 8:30 a.m.

21 Dong Lin

2-12-2025

22 Date

23 DONG LIN
Defendant

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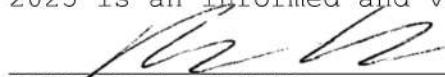
CERTIFICATION OF INTERPRETER

I, Simon Yau, am fluent in the written and spoken English and Mandarin languages. I accurately translated this entire agreement from English into Mandarin to defendant Lin on this date.

English

2/12/2025
Date

1 I am Daniel Acosta Hoffman's attorney. I have carefully
2 discussed every part of this stipulation and the continuance of the
3 trial date with my client. I have fully informed my client of his
4 Speedy Trial rights. To my knowledge, my client understands those
5 rights and agrees to waive them. I believe that my client's decision
6 to give up the right to be brought to trial earlier than March 18,
7 2025 is an informed and voluntary one.

8 
9 RICHARD W. RAYNOR
10 Attorney for Defendant
Daniel Acosta Hoffman

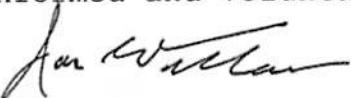
February 12, 2025
Date

11
12 I have read this stipulation and have carefully discussed it
13 with my attorney. I understand my Speedy Trial rights. I voluntarily
14 agree to the continuance of the trial date, and give up my right to
15 be brought to trial earlier than March 18, 2025. I understand that I
16 will be ordered to appear in Courtroom 9A of the Federal Courthouse,
17 350 W. 1st Street, Los Angeles, California on December 8, 2025 at
18 8:30 a.m.

19 Daniel Acosta Hoffman
20 Daniel Acosta Hoffman
Defendant

02/12/25
Date

1 I am Jesse James Rosales's attorney. I have carefully discussed
2 every part of this stipulation and the continuance of the trial date
3 with my client. I have fully informed my client of his Speedy Trial
4 rights. To my knowledge, my client understands those rights and
5 agrees to waive them. I believe that my client's decision to give up
6 the right to be brought to trial earlier than March 18, 2025 is an
7 informed and voluntary one.

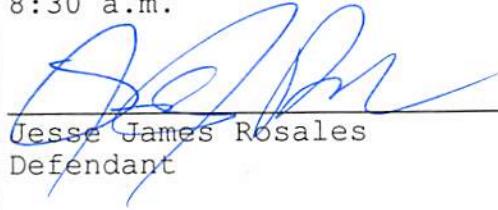


February 7, 2025

Date

9 IAN MICHAEL WALLACH
10 Attorney for Defendant
Jesse James Rosales

11
12 I have read this stipulation and have carefully discussed it
13 with my attorney. I understand my Speedy Trial rights. I voluntarily
14 agree to the continuance of the trial date, and give up my right to
15 be brought to trial earlier than March 18, 2025. I understand that I
16 will be ordered to appear in Courtroom 9A of the Federal Courthouse,
17 350 W. 1st Street, Los Angeles, California on December 8, 2025 at
18 8:30 a.m.



2/7/25

Date

20 Jesse James Rosales
Defendant

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1 I am Andy Estuardo Castillo Perez's attorney. I have carefully
2 discussed every part of this stipulation and the continuance of the
3 trial date with my client. I have fully informed my client of his
4 Speedy Trial rights. To my knowledge, my client understands those
5 rights and agrees to waive them. I believe that my client's decision
6 to give up the right to be brought to trial earlier than March 25,
7 2025 is an informed and voluntary one.

8 *Katherine C. McBroom*

02/13/25

9 Date

10 KATHERINE McBroom
11 Attorney for Defendant
12 ANDY ESTUARDO CASTILLO PEREZ

13 I have read this stipulation and have carefully discussed it
14 with my attorney. This agreement has been read to me in Spanish, the
15 language I understand best, and I have carefully discussed every part
16 of it with my attorney. I understand my Speedy Trial rights. I
17 voluntarily agree to the continuance of the trial date, and give up
18 my right to be brought to trial earlier than March 25, 2025. I
19 understand that I will be ordered to appear in Courtroom 9A of the
20 Federal Courthouse, 350 W. 1st Street, Los Angeles, California on
December 8, 2025 at 8:30 a.m.

21 *Andy Estuardo Castillo Perez (Feb 13, 2025 20:05 PST)*

02/13/2025

22 Date

23 ANDY ESTUARDO CASTILLO PEREZ
24 Defendant

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CERTIFICATION OF INTERPRETER

I, Monica Desiderio, am fluent in the written and spoken English and Spanish languages. I accurately translated this entire agreement from English into Spanish to defendant Castillo Perez on this date.

Monica Desiderio

02/13/2025

Date

1 I am Marck Anthony Gomez' attorney. I have carefully discussed
2 every part of this stipulation and the continuance of the trial date
3 with my client. I have fully informed my client of his Speedy Trial
4 rights. To my knowledge, my client understands those rights and
5 agrees to waive them. I believe that my client's decision to give up
6 the right to be brought to trial earlier than March 18, 2025 is an
7 informed and voluntary one.

8 *Julia Deixler*

2/12/25

9 Date

10 Julia Deixler
Attorney for Defendant
Marck Anthony Gomez

11

12 I have read this stipulation and have carefully discussed it
13 with my attorney. I understand my Speedy Trial rights. I voluntarily
14 agree to the continuance of the trial date, and give up my right to
15 be brought to trial earlier than March 18, 2025. I understand that I
16 will be ordered to appear in Courtroom 9A of the Federal Courthouse,
17 350 W. 1st Street, Los Angeles, California on December 8, 2025 at
18 8:30 a.m.

19 *M. Gomez*

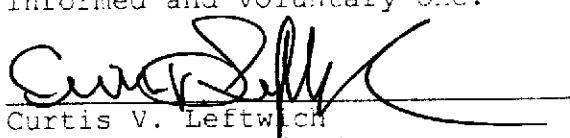
02/12/2025

20 Date

21 Marck Anthony Gomez
Defendant

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1 I am Galvin Biao Liufu's attorney. I have carefully discussed
2 every part of this stipulation and the continuance of the trial date
3 with my client. I have fully informed my client of his Speedy Trial
4 rights. To my knowledge, my client understands those rights and
5 agrees to waive them. I believe that my client's decision to give up
6 the right to be brought to trial earlier than March 18, 2025 is an
7 informed and voluntary one.

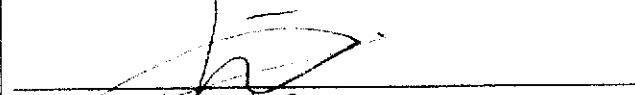
8 

2/12/25

9 Date

10 Curtis V. Leftwich
Attorney for Defendant
Galvin Biao Liufu

11
12 I have read this stipulation and have carefully discussed it
13 with my attorney. ~~This agreement has been read to me in Mandarin,~~
14 ~~the language I understand best, and~~ I have carefully discussed every
15 part of it with my attorney. I understand my Speedy Trial rights. I
16 voluntarily agree to the continuance of the trial date, and give up
17 my right to be brought to trial earlier than March 18, 2025. I
18 understand that I will be ordered to appear in Courtroom 9A of the
19 Federal Courthouse, 350 W. 1st Street, Los Angeles, California on
20 December 8, 2025 at 8:30 a.m.

21 

02/12/2025

22 Date

23 Galvin Biao Liufu
Defendant

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